

*Sent. n. d. n. J*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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-----X  
BARBARA STROUGO, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiffs,

-against-

BARCLAYS PLC, BARCLAYS CAPITAL, INC.,  
ROBERT DIAMOND, ANTONY JENKINS,  
CHRISTOPHER LUCAS, TUSHAR MORZARIA, and  
WILLIAM WHITE,

Defendants.  
-----X

Civil Action No.:  
1:14-cv-05797-SAS

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING  
DEFENDANTS' MOTION TO DISMISS THE AMENDED COMPLAINT**

WHEREAS, on July 28, 2014, Plaintiffs filed their original Complaint against Barclays PLC, Robert Diamond, Antony Jenkins, Christopher Lucas, and Tushar Morzaria (collectively, the "Original Defendants"), which consisted of 29 pages and 86 paragraphs; (Docket No. 1)

WHEREAS, on October 2, 2014, the Court appointed Mohit Sahni as Lead Plaintiff and Pomerantz LLP as Lead Counsel for Lead Plaintiff (Docket No. 11);

WHEREAS, on November 13, 2014, the Court issued a Scheduling Order pursuant to which Plaintiffs were to file an amended complaint no later than December 15, 2014; any response thereto was due to be filed no later than January 19, 2015; any opposition papers to any motion to dismiss were due to be filed no later than February 16, 2015; and any reply papers were due to be filed no later than March 2, 2015 (Docket No. 13);

WHEREAS, both January 19, 2015 and February 16, 2015 are holidays on which the offices of the parties and the Court are closed;

WHEREAS, on December 15, 2014, Plaintiffs filed their Consolidated Amended Complaint ("CAC") against each of the Original Defendants, added Barclays Capital Inc. and William White as defendants (together with the Original Defendants, the "CAC Defendants"), and also added a number of allegations in the CAC that did not exist in the original Complaint (Docket No. 20);

WHEREAS, the CAC consists of 86 pages and 233 paragraphs;

WHEREAS, on January 6, 2015, Barclays PLC and Barclays Capital Inc. (together, "Barclays") agreed to accept service of the CAC on behalf of all of the CAC Defendants;

WHEREAS, the CAC Defendants have agreed to file a single, consolidated motion to dismiss on behalf of all of the CAC Defendants rather than separate motions to dismiss on behalf of each of the CAC Defendants; and

WHEREAS, the parties have agreed, pending the Court's approval, that additional pages beyond the limits set forth in Rule IV.G of the Court's Individual Rules and Procedures will be necessary for the briefs associated with the CAC Defendants' consolidated motion to dismiss the CAC, and that the opening brief in support of that motion to dismiss, and any opposition brief thereto, will not be due on holidays (but rather will be due on the days directly following those holidays);

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, through their undersigned counsel, as follows:

1. The CAC Defendants' consolidated motion to dismiss the CAC shall not exceed

forty-five (45) pages in length, and shall be due on January 20, 2015;

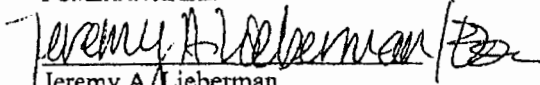
2. Plaintiffs' opposition to the CAC Defendants' consolidated motion to dismiss the CAC shall not exceed forty-five (45) pages in length, and shall be due on February 17, 2015; and
3. The CAC Defendants' reply brief shall not exceed twenty-five (25) pages in length, and shall be due on March 2, 2015.

The parties have agreed to reserve all other rights.

Dated: January 6, 2015  
New York, New York

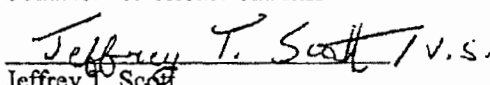
Respectfully submitted,

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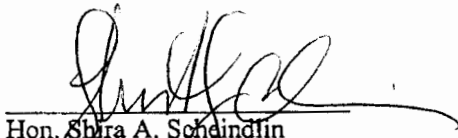
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Attorney for Defendants

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: Jan. 7, 2015

  
Hon. Shira A. Schindlin  
United States District Judge